

Law Offices of
Donald J. Yannella

A Professional Corporation
Email: nynjcrimlawyer@gmail.com
Tel: (212) 226-2883
Fax: (646) 430-8379

135 Prospect Street
Ridgewood, NJ 07450

299 Broadway, Suite 800
New York, NY 10007

March 21, 2024

Hon. Paul G. Gardephe
United States District Judge
40 Foley Square
New York, NY 10007

Re: United States v. Angie Meleico
19 Cr. 789 (PGG)

Hon. Paul G. Gardephe:

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.

Dated: March 22, 2024

I am counsel for Angie Melecio, who was sentenced on January 5, 2022, to time served followed by three years of supervised release. As reflected in the judgment (ECF No. 694), the sentence also included 6 months of electronic monitoring with home detention, 250 hours of community service, and mental health counseling.

Supervised release is scheduled to end on January 5, 2025, less than ten months from now. On behalf of Ms. Melecio, I submit this letter motion requesting early termination of supervised release, pursuant to 18 U.S.C. § 3583(e).

Legal Standard:

Section 3583 of Title 18, Inclusion of a term of supervised release after imprisonment, provides in pertinent part:

(e) Modification of conditions or revocation. - The court may, after considering the factors set forth in section 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7), (1) terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the

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defendant and the interest of justice(.)

Analysis:

After her arrest in this case on November 7, 2019, Ms. Melecio was under Pretrial Supervision for 26 months, including throughout the pandemic. While under Pretrial Supervision, Ms. Melecio was employed, cared for her two children, and complied with the terms of her release.

Ms. Melecio has fully complied with the terms of supervised release for the past twenty-six plus months. She had no issues with home detention and electronic monitoring, and she completed her 250 hours of community service. She continues to attend mental health counseling once per week, and that would not change if supervised release were terminated.

Ms. Melecio's adjustment to her term of supervised release, as well as the basis for her request for early termination, are discussed more fully in her attached letter. (Ex. A). The reasons include helping to take her ailing mother to multiple medical appointments per week, while working and caring for her two children. We respectfully submit that the exceptional circumstances of this case warrant early termination of supervised release.

United States Probation Officer Lisa Famularo, who supervises Ms. Melecio, informs me that she "supports" this motion. AUSA Mathew Andrews informs me that he has no objection to the motion.

Sincerely,

/s/

Donald Yannella, Esq.

cc. US Probation Officer Lisa Famularo
AUSA Mathew Andrews